

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

JANE DOE 1,)	
)	
JANE DOE 2,)	Case No. 7:22-cv-00163
)	
JANE DOE 3,)	
)	
JANE DOE 4,)	
)	
and)	
)	
JANE DOE 5,)	
)	
Plaintiffs,)	
)	
v.)	
)	
ROANOKE COUNTY SCHOOL)	
BOARD,)	
)	
DR. DANIEL LYONS,)	
)	
DOMINICK MCKEE,)	
)	
JASON BREEDING,)	
)	
JILL GREEN,)	
)	
CHRISTOPHER MORRIS,)	
)	
LAURIE MCCRACKEN,)	
)	
and)	
)	
LORSTAN ALLEN)	
)	
Defendants.)	

**PLAINTIFFS JANE DOES 3, 4, AND 5'S MOTION
FOR LEAVE TO PROCEED UNDER A PSEUDONYM**

COME NOW Plaintiffs Jane Does 3, 4, and 5, by and through counsel, and respectfully request that this Court enter an Order allowing them to proceed under the pseudonyms of Jane Doe 3, Jane Doe 4, and Jane Doe 5 pursuant to the factors set forth in *James v. Jacobson*, 6 F.3d 233 (4th Cir. 1993). These Plaintiffs seek this relief to prevent disclosure of their identities as the victims of sexual grooming and assaults, which would cause them irreparable harm. The factual and legal support for this motion is set forth in the contemporaneously filed Memorandum of Law.

WHEREFORE, these Plaintiffs respectfully request that the Court grant this Motion and allow them to proceed under a pseudonym. An appropriate Order is attached hereto as Exhibit A.

Respectfully submitted,

JANE DOE 3, JANE DOE 4, AND JANE
DOE 5

By: /s/ Carrol M. Ching
Of Counsel

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of the filing to all counsel of record.

/s/ Carrol M. Ching

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